

Operating Procedures for EPA's Contaminated Sediments Technical Advisory Group (CSTAG)

Background

OSWER Directive 9285.6-08, *Principles for Managing Contaminated Sediment Risks at Hazardous Waste Sites* (Feb. 12, 2002), established the CSTAG as a technical advisory group to “monitor the progress of and provide advice regarding a small number of large, complex, or controversial contaminated sediment Superfund sites”.

Purpose of the CSTAG

- To help RPMs and OSCs of a select number of large, complex, or controversial sediment sites appropriately investigate and manage their sites in accordance with the 11 risk management principles.
- To encourage national consistency in the management of sediment sites by providing a forum for exchange of technical and policy information.
- To provide a mechanism for monitoring and evaluating the progress at a number of the largest or most complex contaminated sediment sites.

Membership

CSTAG membership includes one representative per Region (except that some Regions have an alternate), two from ORD, and two from OERR. The current list of members is presented below. Members are expected to participate in monthly conference calls and approximately four meetings per year, each lasting 2-3 days. Many of these meetings will include site visits, which may involve extra travel time. The representative for the Region in which a site is being visited is expected to make arrangements for hotel rooms and meeting space. Each member's Region or Office is expected to pay all travel costs; in most cases this can be charged to site-specific accounts. The group, at least initially, will have two co-chairs, one from a Region and one from Headquarters. The Regional co-chair position will rotate among the Regions and the length of service will normally be one year. Membership entails a significant time commitment, especially when a member is a co-chair or when preparing for a meeting to be held in his or her Region.

Meetings

The RPM (or OSC) will be notified of the planned CSTAG meeting approximately three months prior to the meeting. The initial meeting for each site will be near the site and will include an overview of the site by the RPM that focuses on how the RPM is considering the 11 principles (this part of the meeting may include other EPA staff and contractors, and State staff,

where the sediment OU is State-lead), a site visit, a half-day session where stakeholders may make presentations, and a half-day CSTAG-only session where the CSTAG begins drafting its recommendations. In addition to the CSTAG members and Regional/State staff, the appropriate OERR Regional coordinator will also be invited to attend. The RPM should submit a written summary addressing each of the 11 principles to the co-chairs at least one month prior to the meeting. Selected sections of technical documents may be appended to add additional details if needed. Initial meetings will focus on only one site; while subsequent meetings will be held in the Regional offices or HQ and may focus on a couple of sites already visited. Subsequent meetings will focus on agreed-upon site topics appropriate to the phase of the project. The CSTAG plans to monitor the progress at each site until all remedial action objectives and cleanup levels have been met.

Stakeholder Participation

Although these CSTAG meetings are not public meetings, the Regional CSTAG member and RPM will give key stakeholder groups that have had significant involvement with the site the opportunity to give a short oral presentation to the CSTAG at the *first* site meeting. This will normally include the lead State agency, lead PRP, lead trustee, tribe(s), and recognized community groups such as those with a TAG. To allow time for adequate presentations and questions from the CSTAG members, no more than four to six presentations should be scheduled.

The key stakeholders should be sent written invitations at least six weeks before the meeting in order to allow time to prepare a presentation if they decide to make one. The presentation should focus on how they think EPA is or should be addressing the 11 principles at the site. If four to six stakeholders will make a presentation, each one should be no more than 20 minutes with an additional 10 minutes available for discussion with the CSTAG members. If the invited stakeholders elect not to make an oral presentation, they may submit a written one instead. Other parts of the meeting will be reserved for EPA, or EPA and the State where the sediment OU is State-Lead. Other stakeholders not invited to the meeting, may submit written comments to the CSTAG on how the 11 Principles should be considered. All written submittals, including a summary of each oral presentation, should be sent to EPA RPM at least one week prior to the meeting and should not exceed ten pages.

CSTAG Recommendations

After the initial meeting on a site, and after subsequent meetings as appropriate, the CSTAG will provide to the RPM, within six weeks, a list of recommendations on how the RPM might better address the 11 principles in ongoing and planned work. The appropriate Regional Branch Chief and Division Director as well as the OERR Office Director, Regional Branch Chief and Regional coordinator, will be copied. The RPM will provide the CSTAG co-chairs with a brief written response to all recommendations within two months of receiving them. The RPM will also send a copy of the response, along with the CSTAG recommendations, to all

stakeholders that attended the meeting. OERR will also place the CSTAG recommendations and the regional response on the Contaminated Sediments in Superfund Web page at www.epa.gov/superfund/resource/sediment.

Coordination with the National Remedy Review Board

It is anticipated that the proposed remedy for most of these large sites will also meet the requirements for review by the National Remedy Review Board (NRRB). When an RPM prepares the site package for the NRRB, the RPM should also prepare and submit to the NRRB and the CSTAG co-chairs a draft “consideration memo”. The memo should document how all 11 principles were considered in selecting the proposed remedy for the site and should normally be less than 20 pages.. The CSTAG co-chairs will distribute the memo to the CSTAG members for their review. In order to avoid sending two sets of recommendations to the RPM and having the RPM prepare two responses, any comments that CSTAG members have will be relayed to the Chair of the NRRB by the CSTAG co-chairs. Two members of the CSTAG will attend the RRB meeting to offer assistance on site issues relative to the 11 principles. It is expected that a Regional and HQ member will attend, and one of the members will be a co-chair.

The CSTAG may modify these operating procedures after more sites have been visited and more experience has been gained.

Current CSTAG Members

Region 1	Kymberlee Keckler	617-918-1385
Region 2	Mel Hauptman	212-637-4338
Region 3	Randy Sturgeon	215-814-3227
Region 4	Al Hanke	404-562-8954
	Craig Zeller*	404-562-8827
Region 5	Tom Short, Co-chair	312-353-8826
	Bonnie Eleder*	312-886-4885
Region 6	John Meyer	214-665-6742
Region 7	Craig Smith	913-551-7683
Region 8	Judith McCulley	303-312-6667
	Russ Forba*	406-441-1150
Region 9	Fred Schauffler	415-972-3174
Region 10	Allison Hiltner	206-553-2140
	Karen Keeley*	206-553-2141
ORD/NAR	Barbara Bergen	401-782-3059
ORD/ATH	Earl Hayter	706-355-8303
OERR	Steve Ells, Co-Chair	703-603-8822
OERR	Leah Evison	703-603-9022

* alternate member